



Robert Finch, President  
820 Great Cumberland Road  
McLean, VA 22102

February 22, 2011

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Via Electronic Submission

Dear Ms. Dortch:

On Feb 9<sup>th</sup> 2011, the National EBS Association ("NEBSA") and the Catholic Television Network ("CTN") filed a request to extend the current May 1, 2011 deadline by which Educational Broadband Service ("EBS") licensees must demonstrate that they are providing substantial service according to FCC rules. Cirpass LLC is a consulting firm serving multiple EBS licensees, including many that are in the process of deploying EBS-based wireless systems. As a result of our work we have also concluded that there is good reason to support the request for an extension to November 1, 2011.

The circumstances described in the NEBSA and CTN request are fully consistent with the situations that Cirpass has found while working with EBS licensees, radio system manufacturers, wireless engineering firms and systems integrators. Based on Cirpass conversations with multiple equipment manufacturers, we believe that grant of the requested extension will be of great help to such educational institutions meet their goals at prices they can afford.

This benefit to educators and their prospective suppliers will be best realized if the Commission acts quickly to approve the requested extension, and Cirpass LLC urges the Commission to expeditiously approve the NEBSA and CTN request.

Respectfully submitted,  
Cirpass LLC

By:

A handwritten signature in blue ink, appearing to read "Robert Finch", is written over a horizontal line.

Robert Finch

Cc: Ruth Milkman  
John Leibovitz  
Blaise A. Scinto  
John J. Schauble